New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Thomas C. Jorling
Commissioner

October 25, 1993

Mr. Jim Colter
Northern Division
Naval Facilities Engineering Command
Industrial Highway - Mail Stop 82
Lester, PA 19113-2090

Dear Mr. Colter:

RE: NWIRP - BETHPAGE
SITE #130003B

The State's comments on the draft Feasibility Study Report (September 1993) for the above-referenced site are attached. The State reserves comment on the groundwater treatment strategies which are discussed in the FS. However, please be advised that the State will require that the groundwater which is migrating off the Grumman site meet the New York State Department of Health's drinking water standards. An additional line of compliance will be the Navy's eastern property boundary. As proposed, the Navy's preferred solution, when compared to a conceptual idea of what the Grumman on-site ROD may entail, may lead to a duplicative and cost ineffective solution which may be difficult and confusing to implement administratively (DEC, DOH, and EPA).

The State would prefer to address the bulk of groundwater remediation as a separate Navy ROD to be issued in conjunction with the Grumman on-site ROD. However, groundwater strategies will be addressed in the upcoming 1993 Navy PRAP/ROD. These include:

a. Design and implement a pump and treat program to address what appears to be a localized occurrence of DNAPL (HN-24 area). This may be beyond the scope of pump and treat scenarios which have been evaluated to date. For example, the use of surfactants may be required in order to remove DNAPLs.

b. Design and implement a pump and treat program as part of the Site 1 source control program.

In addition to the above remedial strategies, source control (vacuum extraction) and treatment at public water supply strategies will also be incorporated into the 1993 Navy PRAP/ROD.

Please contact me at (518) 457-3395 if you have any questions regarding this matter.

Very truly yours,

John D. Barnes

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JB/dd
nwirp15

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**Comments by the State of New York**

**Draft Feasibility Study Report (9/93)**
**NWIRP-Bethpage - Site # 130003B**

A. Comments on the Preferred Remedy

1. Per the discussions at the September 16, 1993 Technical Review Committee meeting, it is the State's understanding that the Navy will finance the capital and operational costs for the treatment system at BWD Plant 5 (instead of Plant 4).

2. On page 3-11 of the FS, it states that "In accordance with TSCA regulations, soils containing PCBs in concentrations greater than 50 ppm, which occurs only in Site 1, would be excavated and transported to an approved off-site incineration facility". Furthermore it states that "This alternative includes off-site disposal for soils containing PCBs in concentrations between 10 ppm and 50 ppm. Off-site disposal is an acceptable method based on TSCA regulatory criteria and is more economical than incineration. Soils of concern would be excavated and transported offsite to an approved hazardous waste landfill."

   TSCA does not require that PCB-contaminated soils be incinerated, regardless of the PCB concentration. Because of the low projected volume of PCB hazardous wastes (300 cy), this waste should be disposed off-site along with the waste containing PCB concentrations in the 10 ppm to 50 ppm range. Since off-site incineration of hazardous wastes at a TSD facility represents the highest remedial cost per pound of waste incinerated, the change to off-site disposal will have a significant impact upon the costs of those remedial alternatives which involve off-site incineration as well as their ranking relative to the remaining alternatives. These alternatives should then be re-evaluated.

3. The feasibility of treating PCBs down to the 1 ppm level must be evaluated per the Department's TAGM 4046 and the NYSDOH residential use requirements.

4. A more detailed discussion on the fixation of the arsenic-contaminated soils needs to be incorporated into the FS in order to clarify what is proposed.

5. In order to dispose of the fixated arsenic-wastes in a non-hazardous waste landfill, the fixated product must pass the TCLP leachability test.

6. It would be helpful to the reader if maps were incorporated into Section 3 which show proposed locations for extraction wells, soil cover, etc.

7. It is our understanding that a fifth section will be incorporated into the final report in which the conclusions and recommendations are outlined.

8. For many of the alternatives for addressing the soils contamination, the quantity of soils to be treated under the industrial use scenario is greater than for the future residential use scenario. One would expect the opposite to be true, especially considering that the future residential use scenario would have stricter ARARs than the industrial use scenario. This issue needs to be addressed.

9. The baseline risk assessments described in Sections 1.5.4, 1.6.4, and 1.7.4 are incomplete in that the rationale used to describe which exposure scenarios were evaluated is not provided. The rationale for eliminating exposure scenarios from the analysis of risk must be provided. This includes a discussion(s) for all potential current and future exposure pathways.

B. Specific Comments

1. pg. ES-4: Is the Navy recommending Alternative 3A or 3B?

2. pg. 2-95: In the conclusion presented on this page, it states that "Although low temperature thermal stripping would not provide removal of pesticides/PCBs, inorganics and some semi-volatile organics, it can be used effectively in the removal of VOCs and ...".

   LTTD has been successfully demonstrated at several sites. These include many PCB sites as well as a pesticides-contaminated site. This process is also applicable to PAHs.

3. pg. 2-104: Fixation is eliminated from further consideration according to the entry in Table 2-20. Since this technology is to be incorporated into the preferred remedy, the aforementioned entry must be corrected.

4. pg. 3-11 (and elsewhere): On-site regeneration of carbon may be a viable option. The PRAP will be written such that this can be considered during the design phase(s).

5. Figure 3-10: The mass balance in/out of the GAC unit is difficult to follow.

6. pg. 3-35: Ultrafiltration may be a viable technology for removing the metal "floc".

7. pg 4-2, first bullet: Add the word "health" between "human" and "and".